

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the)	WT Docket No. 16-239
Commission's Amateur Radio Service)	
Rules to Permit Greater Flexibility in Data)	RM-11708
Communications)	
)	

To: The Commission:

**Comments of Nickolaus E. Leggett, Certified Electronics Technician, Amateur Radio
Operator (N3NL), GROL Licensee, Inventor, and Analyst**

I am a certified electronics technician (iNARTE and ISCET) and an Extra Class amateur radio operator (call sign N3NL). I also hold an FCC General Radiotelephone Operator License with a Ship Radar Endorsement. I am an inventor holding three U.S. Patents. My latest patent is a wireless bus for digital devices and computers (U.S. Patent # 6,771,935). I have a Master of Arts degree in Political Science from the Johns Hopkins University (1970).

I am one of the original petitioners for the establishment of the Low Power FM (LPFM) radio broadcasting service (RM-9208 July 7, 1997 subsequently included in MM Docket 99-25). I am also one of the petitioners in the docket to establish a low power radio service on the AM broadcast band (RM-11287). I have filed a total of well over 200 formal comments with the FCC over the years since the 1970s. I have filed comments with other Federal agencies as well including the USPTO, NASA, FAA, FERC, EPA, and the TSA.

A Logical Problem with this NPRM

The basic logic of this Commission Notice of Proposed Rule Making (NPRM) is flawed. It just does not make logical sense to promote broader bandwidth digital communications on the very narrow high-frequency (HF) amateur radio allocations. This is like encouraging huge trucks to operate on tiny county roads. The huge trucks will tend to displace the little cars and bicycles using these roads.

Instead, the Commission should be promoting very narrow-bandwidth communications modes on the narrow amateur radio allocations. Several of these narrow-bandwidth digital modes have been shown to be quite practical for amateur digital communications. They should be the future for narrow amateur radio allocations.

How to Deal with this Issue

Evidently, a large number of amateur radio operators, including the ARRL, want to promote the broader bandwidth digital communications. So we need to conduct an on-the-air experiment to test out the actual consequences of promoting broader bandwidth digital communications.

This can be done by restricting the proposed new rule to amateur radio HF allocations above the 20-meter amateur band for a period of several years. This would allow the amateur radio community to develop real-world experience with the broader digital modes on HF bands without causing major damage to current operations. This experience could then be used to develop rational rules for the more crowded amateur radio digital sub-bands. This would allow the proposal to be tested without flooding away the narrow-band and Morse Code digital activity on the HF bands.

Respectfully submitted,

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